

REVISED 12/17/08

Page 18 of 18

- c. 12-hour composite sample consists of 12 effluent portions collected no closer together than one hour over the 12-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 12-hour period. The daily sampling intervals shall include the highest flow periods.
- d. 24-hour composite sample consists of a minimum of 12 effluent portions collected at equal time intervals over the 24-hour period and combined proportional to flow or a sample continuously collected in proportion to flow over the 24-hour period.

**LPDES PERMIT NO. LA0087785, AI No. 582****LPDES STATEMENT OF BASIS  
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA**

**Company/Facility Name:** Plantation Pipe Line Company  
Baton Rouge Tank Farm  
P.O. Box 1871  
Baton Rouge, LA 70821

**Issuing Office:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services (Office)  
P. O. Box 4313  
Baton Rouge, LA 70821-4313

**Prepared By:** Gene Jarreau  
Level 1 Industrial Permits Section  
Water Permits Division  
Phone #: (225) 219-3080  
E-Mail: Gene.Jarreau@la.gov

**Date Prepared:** January 26, 2010

**I. Permit Action/Status:****Reason For Permit Action:**

Proposed reissuance of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

- A. LPDES permit - Individual LPDES Permit  
LPDES permit effective date: August 1, 2003  
LPDES permit expiration date: July 31, 2008
- B. Application received on January 31, 2008. Application Addendum received via e-mail on January 22, 2010.

**II. Facility Information:**

- A. Location - 2200 Blount Road, Baton Rouge  
East Baton Rouge Parish  
Latitude 30°32'42", Longitude 91°09'58"

Statement of Basis for  
Plantation Pipe Line Company, Baton Rouge Tank Farm  
LA0087785, AI No. 582  
Page 2

**B. Applicant Activity -**

Plantation Pipe Line Company - Baton Rouge Tank Farm is an existing facility that is a combination breakout tank farm and pumping station for a refined petroleum pipeline. The breakout tanks are used to receive and temporarily store refined liquid petroleum products, which are then transported via the pipeline system.

**C. Sources of technology based limits:**

Current Permit (effective August 1, 2003)

LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA).

Current practices regarding similar discharges/facilities in individual permits.

Best Professional Judgment (BPJ)

Light Commercial Facilities General Permit LAG480000

Hydrostatic Test and Vessel Testing Wastewater General Permit LAG670000

**D. Fee Rate -**

- i) Fee Rating Facility Type: Minor
- ii) Complexity Type: II
- iii) Wastewater Type: III
- iv) SIC Code: 4613

**E. Continuous Facility Effluent Flow – 0 GPD**

**III. Receiving Waters: Monte Sano Bayou**

**A. River Basin: Mississippi River, Segment No. 070504**

**B. Designated Uses:**

The designated uses are secondary contact recreation, and limited aquatic life and wildlife use.

**IV. Outfall Information:**

**Outfall 001**

- A. Type of wastewater – the intermittent discharge of treated stormwater runoff, fire pump test water, non-contact cooling water from fire pumps and bearings, accumulated groundwater seepage from a below ground electrical service manhole, exterior storage tank washwater, and hydrostatic test/vessel testing wastewater (from Internal Outfall 101).
- B. Location – Monitored at the point of discharge from the south side of the southwest catchment basin, prior to mixing with other waters. (Latitude 30° 32' 42", Longitude 91° 10' 08")
- C. Treatment - Oil/Water Separation

Statement of Basis for  
Plantation Pipe Line Company, Baton Rouge Tank Farm  
LA0087785, AI No. 582  
Page 3

- D. Flow - Intermittent, 1,063,900 GPD
- E. Receiving waters – Monte Sano Bayou, via ditch.
- F. Basin and segment - Mississippi River Basin, Segment 070504.

Internal Outfall 101

- A. Type of wastewater – the intermittent discharge of hydrostatic test/vessel testing wastewater.
- B. Location – Monitored at the point of discharge from the piping/tank in the western two-thirds of the facility, prior to mixing with other waters.
- C. Treatment - None
- D. Flow - Intermittent, 567,221 GPD
- E. Receiving waters – Monte Sano Bayou, via on-site ditches and final Outfall 001.
- F. Basin and segment - Mississippi River Basin, Segment 070504.

Outfall 002

- A. Type of wastewater – the intermittent discharge of treated stormwater runoff, fire pump test water, non-contact cooling water from fire pumps and bearings, exterior storage tank washwater, and hydrostatic test/vessel testing wastewater (from Internal Outfall 102).
- B. Location – Monitored at the point of discharge from the east side of the east catchment basin, prior to mixing with other waters. (Latitude 30° 32' 48", Longitude 91° 09' 23")
- C. Treatment - Oil/Water Separation
- D. Flow - Intermittent, 531,180 GPD
- E. Receiving waters – Monte Sano Bayou, via ditch.
- F. Basin and segment - Mississippi River Basin, Segment 070504.

Internal Outfall 102

- A. Type of wastewater – the intermittent discharge of hydrostatic test/vessel testing wastewater.
- B. Location – Monitored at the point of discharge from the piping/tank in the eastern one-third of the facility, prior to mixing with other waters.

Statement of Basis for  
Plantation Pipe Line Company, Baton Rouge Tank Farm  
LA0087785, AI No. 582  
Page 4

- C. Treatment - None
- D. Flow - Intermittent, 1,114 GPD
- E. Receiving waters – Monte Sano Bayou, via on-site ditches and final Outfall 002.
- F. Basin and segment - Mississippi River Basin, Segment 070504.

**V. Proposed Changes from Current Permit:**

Summary of proposed changes from the current LPDES permit:

The Storet Code for BTEX changed from “30383” to “49491”.

Outfall 001

Location changed from Latitude 30° 32' 47", Longitude 91° 10' 09" to Latitude 30° 32' 42", Longitude 91° 10' 08".

Internal Outfall 101

Type of wastewater changed from “hydrostatic test water” to “hydrostatic test/vessel testing wastewater”.

Location changed from “Monitored at the point of discharge from the tank, pipeline, and/or equipment prior to mixing with other waters.” to “Monitored at the point of discharge from the piping/tank in the western two-thirds of the facility, prior to mixing with other waters.”

Outfall 002

Location changed from Latitude 30° 32' 48", Longitude 91° 09' 24" to Latitude 30° 32' 48", Longitude 91° 09' 23".

Internal Outfall 102

Type of wastewater changed from “hydrostatic test water” to “hydrostatic test/vessel testing wastewater”.

Location changed from “Monitored at the point of discharge from the tank, pipeline, and/or equipment prior to mixing with other waters.” to “Monitored at the point of discharge from the piping/tank in the eastern one-third of the facility, prior to mixing with other waters.”

**VI. Permit Limit Rationale:**

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

- A. **Outfall 001** – the intermittent discharge of treated stormwater runoff, fire pump test water, non-contact cooling water from fire pumps and bearings, accumulated groundwater seepage from a below ground electrical service manhole, exterior storage tank washwater, and hydrostatic test/vessel testing wastewater (from Internal Outfall 101).

Statement of Basis for  
 Plantation Pipe Line Company, Baton Rouge Tank Farm  
 LA0087785, AI No. 582  
 Page 5

This discharge shall be limited and monitored by the permittee according to the following schedule:

| <u>PARAMETER</u>           | <u>MONTHLY<br/>AVERAGE</u> | <u>DAILY<br/>MAXIMUM</u> | <u>MONITORING<br/>FREQUENCY</u> |
|----------------------------|----------------------------|--------------------------|---------------------------------|
| Flow                       | NA                         | Report<br>(GPD)          | 1/month                         |
| COD                        | NA                         | 125 (mg/L)               | 1/month                         |
| TOC                        | NA                         | 50 (mg/L)                | 1/month                         |
| Oil & Grease               | NA                         | 15 (mg/L)                | 1/month                         |
| Total BTEX                 | NA                         | Report<br>(ug/L)         | 1/month                         |
| Soaps and/or<br>Detergents | Report                     | NA                       | 1/month                         |
| pH                         | 6.0 - 9.0 s.u. (Min - Max) |                          | 1/month                         |

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.I.1.b and the current permit. Flow shall be estimated once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**COD** - Effluent limitations are established in accordance with BPJ, the current permit, the Light Commercial Facilities General Permit LAG480000, and current practices regarding similar discharges/facilities in individual permits, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**TOC** - Effluent limitations are established in accordance with BPJ, the current permit, current practices regarding similar discharges/facilities in individual permits, and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**Oil and Grease** - Effluent limitations are established in accordance with BPJ, the current permit, the Light Commercial Facilities General Permit LAG480000, current practices regarding similar discharges/facilities in individual permits, and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

Statement of Basis for  
 Plantation Pipe Line Company, Baton Rouge Tank Farm  
 LA0087785, AI No. 582  
 Page 6

**Total BTEX** – Monitoring requirements are established in accordance with BPJ, and the current permit, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**Soaps and/or Detergents** - Monitoring requirements are established in accordance with BPJ, the Light Commercial Facilities General Permit LAG480000, and the current permit, by inventory calculation, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**pH** – Effluent limitations are established in accordance with LAC 33:IX.1113.C.1, BPJ, current practices regarding similar discharges/facilities in individual permits, the current permit, and the Light Commercial Facilities General Permit LAG480000, at a frequency of once a month. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**B. Internal Outfall 101** - the intermittent discharge of hydrostatic test/vessel testing wastewater.

This discharge shall be limited and monitored by the permittee according to the following schedule:

| <u>PARAMETER</u> | <u>MONTHLY<br/>AVERAGE</u> | <u>DAILY<br/>MAXIMUM</u> | <u>MONITORING<br/>FREQUENCY</u> |
|------------------|----------------------------|--------------------------|---------------------------------|
| Flow             | NA                         | Report<br>(GPD)          | 1/prior to discharge            |
| TSS              | NA                         | 90 (mg/L)                | 1/prior to discharge            |
| Oil & Grease     | NA                         | 15 (mg/L)                | 1/prior to discharge            |
| TOC              | NA                         | 50 (mg/L)                | 1/prior to discharge            |
| Benzene          | NA                         | 50 (ug/L)                | 1/prior to discharge            |
| Total BTEX       | NA                         | 250 (ug/L)               | 1/prior to discharge            |
| Lead             | NA                         | 50 (ug/L)                | 1/prior to discharge            |

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.I.1.b, the Hydrostatic Test and Vessel Testing Wastewater General Permit LAG670000, and the current permit. Flow shall be estimated once prior to discharge. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

Statement of Basis for  
 Plantation Pipe Line Company, Baton Rouge Tank Farm  
 LA0087785, AI No. 582  
 Page 7

**TSS, Oil and Grease, TOC, Benzene, Total BTEX, and Lead** - Effluent limitations are established in accordance with the Hydrostatic Test and Vessel Testing Wastewater General Permit LAG670000, and the current permit, at a frequency of once prior to discharge. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

- C. **Outfall 002** - the intermittent discharge of treated stormwater runoff, fire pump test water, non-contact cooling water from fire pumps and bearings, exterior storage tank washwater, and hydrostatic test/vessel testing wastewater (from Internal Outfall 102).

This discharge shall be limited and monitored by the permittee according to the following schedule:

| <u>PARAMETER</u>           | <u>MONTHLY<br/>AVERAGE</u> | <u>DAILY<br/>MAXIMUM</u> | <u>MONITORING<br/>FREQUENCY</u> |
|----------------------------|----------------------------|--------------------------|---------------------------------|
| Flow                       | NA                         | Report<br>(GPD)          | 1/month                         |
| COD                        | NA                         | 125 (mg/L)               | 1/month                         |
| TOC                        | NA                         | 50 (mg/L)                | 1/month                         |
| Oil & Grease               | NA                         | 15 (mg/L)                | 1/month                         |
| Soaps and/or<br>Detergents | Report                     | NA                       | 1/month                         |
| pH                         | 6.0 - 9.0 s.u. (Min - Max) |                          | 1/month                         |

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.1.1.b and the current permit. Flow shall be estimated once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**COD** - Effluent limitations are established in accordance with BPJ, the current permit, the Light Commercial Facilities General Permit LAG480000, and current practices regarding similar discharges/facilities in individual permits, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**TOC** - Effluent limitations are established in accordance with BPJ, the current permit, current practices regarding similar discharges/facilities in individual permits, and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.



Statement of Basis for  
 Plantation Pipe Line Company, Baton Rouge Tank Farm  
 LA0087785, AI No. 582  
 Page 8

**Oil and Grease** - Effluent limitations are established in accordance with BPJ, the current permit, the Light Commercial Facilities General Permit LAG480000, current practices regarding similar discharges/facilities in individual permits, and LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (USEPA), at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**Soaps and/or Detergents** - Monitoring requirements are established in accordance with BPJ, the Light Commercial Facilities General Permit LAG480000, and the current permit, by inventory calculation, at a frequency of once a month. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**pH** - Effluent limitations are established in accordance with LAC 33:IX.1113.C.1, BPJ, current practices regarding similar discharges/facilities in individual permits, the current permit, and the Light Commercial Facilities General Permit LAG480000, at a frequency of once a month. Report both the minimum and maximum instantaneous pH values measured. The units for pH (s.u.) are standard units. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**D. Internal Outfall 102** - the intermittent discharge of hydrostatic test/vessel testing wastewater.

This discharge shall be limited and monitored by the permittee according to the following schedule:

| <u>PARAMETER</u> | <u>MONTHLY<br/>AVERAGE</u> | <u>DAILY<br/>MAXIMUM</u> | <u>MONITORING<br/>FREQUENCY</u> |
|------------------|----------------------------|--------------------------|---------------------------------|
| Flow             | NA                         | Report<br>(GPD)          | 1/prior to discharge            |
| TSS              | NA                         | 90 (mg/L)                | 1/prior to discharge            |
| Oil & Grease     | NA                         | 15 (mg/L)                | 1/prior to discharge            |
| TOC              | NA                         | 50 (mg/L)                | 1/prior to discharge            |
| Benzene          | NA                         | 50 (ug/L)                | 1/prior to discharge            |
| Total BTEX       | NA                         | 250 (ug/L)               | 1/prior to discharge            |
| Lead             | NA                         | 50 (ug/L)                | 1/prior to discharge            |

**Site-Specific Consideration(s)**

**Flow** - Established in accordance with LAC 33:IX.2707.I.1.b, the Hydrostatic Test and Vessel Testing Wastewater General Permit LAG670000, and the current

Statement of Basis for  
Plantation Pipe Line Company, Baton Rouge Tank Farm  
LA0087785, AI No. 582  
Page 9

permit. Flow shall be estimated once prior to discharge. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

**TSS, Oil and Grease, TOC, Benzene, Total BTEX, and Lead** - Effluent limitations are established in accordance with the Hydrostatic Test and Vessel Testing Wastewater General Permit LAG670000, and the current permit, at a frequency of once prior to discharge. These requirements have been retained from the previous LPDES permit, effective on August 1, 2003.

## **VII. TMDL Waterbodies**

Subsegment 070504, Monte Sano Bayou – from US Highway 61 to the Mississippi River, is listed on LDEQ's Final 2006 303(d) List as impaired for dissolved oxygen and chlorine. To date, no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Mississippi River Basin, those suspected causes for impairment which are not directly attributed to this facility type have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Dissolved oxygen was associated with discharges from municipal separate storm sewer systems, which does not apply to this facility. Chlorine was associated with discharges from an unknown source, but there are no known chlorine/chlorine compounds at this facility. Therefore, no additional requirements will be added to this permit.

## **VIII. Compliance History/DMR Review:**

A compliance history/DMR review was done covering the period of January 21, 2007 to January 21, 2010.

### **A. DMR Exceedances Reported**

Referred to LDEQ Enforcement for exceedances on January 25, 2010.

For May 2008, the permittee reported that TSS was not analyzed for the sample taken for Outfall 101. They also reported this was an oversight, and was not identified until the DMR was completed.

Statement of Basis for  
 Plantation Pipe Line Company, Baton Rouge Tank Farm  
 LA0087785, AI No. 582  
 Page 10

| <u>Monitoring Date</u> | <u>PARAMETER</u> | <u>OUTFALL</u> | <u>Sample Measurement</u>                    | <u>Permit Requirement</u>                   |
|------------------------|------------------|----------------|--|---|
| 05-29-07               | pH               | 002            | 9.1 standard units<br>instantaneous maximum  | 9.0 standard units<br>instantaneous maximum |
| 01-06-09               | pH               | 002            | 5.87 standard units<br>instantaneous minimum | 6.0 standard units<br>instantaneous minimum |

B. Inspections

Referred to LDEQ Surveillance on January 25, 2010.

The last water permit routine LDEQ Compliance Evaluation Inspection (CEI) was performed on April 28, 2004. The Stormwater Pollution Prevention Plan was reviewed on site and appeared to be of satisfactory status. DMRs were reviewed on site and the following were noted: (1) Outfall 001 monitoring period 08/01/02 to 08/31/02 showed one excursion for pH; (2) No other excursions were noted in 2002; (3) Outfall 001 monitoring period 05/01/03 to 05/31/03 showed one excursion for pH; (4) No other excursions were noted in 2003, and no excursions were noted for first quarter in 2004. Informed facility that chain-of-custody needs to indicate time pH is being recorded after samples are collected. Overall site appeared to be maintained well.

Excursions for pH in 2002 and 2003 were the basis for a Referral from LDEQ Surveillance to LDEQ Enforcement.

C. Compliance History

There are no open, appealed, or pending water enforcement actions as of January 21, 2010.

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrated two or more consecutive years of permit compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities, and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.

Statement of Basis for  
Plantation Pipe Line Company, Baton Rouge Tank Farm  
LA0087785, AI No. 582  
Page 11

**IX. "IT" Questions - Applicant's Responses**

Plantation Pipe Line Company, Baton Rouge Tank Farm is a minor facility, therefore, IT Questions were not required to be submitted.

**X. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 070504 of the Mississippi River Basin, has not been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for any species, which are listed federally as a threatened species. Also, this type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated January 5, 2010 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species, or the critical habitat.

**XI. Historic Sites:**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**XII. Tentative Determination:**

On the basis of preliminary staff review, the Louisiana Department of Environmental Quality has made a tentative determination to re-issue a permit for the discharges described in the application.

**XIII. Variances:**

No requests for variances have been received by this Office.

**XIV. Public Notices:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public Notice published in:

Local Newspaper of general circulation;  
Office of Environmental Services Public Notice Mailing List.

Statement of Basis for  
Plantation Pipe Line Company, Baton Rouge Tank Farm  
LA0087785, AI No. 582  
Page 12

**XV. Stormwater Pollution Prevention Plan (SWP3) Requirement:**

In accordance with LAC 33:IX.2707.1.3 and LAC 33:IX.2707.1.4 [40 CFR 122.44(I)(3) and (4)], a narrative requirement is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. **For first time permit issuance**, the narrative requirement requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the narrative requirement requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2511.B.14 [40 CFR 122.26(b)(14)].